

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

UNITED STATES OF AMERICA)	Criminal No. 3:24-CR-044
)	
)	18 U.S.C. § 1951
)	Hobbs Act Robbery
v.)	(Counts One and Three)
)	
JOSUE CANO-MORALES,)	18 U.S.C. § 924(c)(1)(A)
)	Using, Carrying, and Brandishing a
)	Firearm During and In Relation to a
)	Crime of Violence
Defendant.)	(Counts Two and Four)
)	
)	Forfeiture Notice

INDICTMENT

March 2024 TERM - At Richmond, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Hobbs Act Robbery)

1. At all times material to this Indictment, the Lucky Mart, located at 8401 Staples Mill Rd, Henrico, Virginia, was a commercial entity engaged in the provision of goods and services in interstate and foreign commerce and an industry that affects interstate commerce.

2. On or about January 22, 2024, in the Eastern District of Virginia and elsewhere, defendant, JOSUE CANO-MORALES, did unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in such commerce, as those terms are defined in Title 18, United States Code, Section 1951, that is, by unlawfully taking and obtaining property consisting of United States currency and other property belonging to Lucky Mart, from the person of and in the presence of an employee, against the employee's will by means of actual and

threatened force, violence, and fear of injury, immediate and future, to said employee's person, that is by brandishing a firearm and demanding from the employee money and other property belonging to the business.

(In violation of Title 18, United States Code, Section 1951).

COUNT TWO

(Using, Carrying, and Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about January 22, 2024, in the Eastern District of Virginia, the defendant, JOSUE CANO-MORALES, did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a Court of the United States, to wit: Hobbs Act Robbery, as charged in Count One of this Indictment, which is re-alleged as if fully set forth and incorporated by reference herein.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

COUNT THREE

(Hobbs Act Robbery)

3. At all times material to this Indictment, the Smoker's World, located at 8125 Staples Mill Rd, Henrico, Virginia, was a commercial entity engaged in the provision of goods and services in interstate and foreign commerce and an industry that affects interstate commerce.

4. On or about January 22, 2024, in the Eastern District of Virginia and elsewhere, defendant, JOSUE CANO-MORALES, did unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in such commerce, as those terms are defined in Title 18, United States Code, Section 1951, that is, by unlawfully taking and obtaining property consisting of United States currency and other property belonging to Smoker's World, from the person of and in the presence of an employee, against the employee's will by means of actual and

threatened force, violence, and fear of injury, immediate and future, to said employee's person, that is by brandishing a firearm and demanding from the employee money and other property belonging to the business.

(In violation of Title 18, United States Code, Section 1951).

COUNT FOUR

(Using, Carrying, and Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about January 22, 2024, in the Eastern District of Virginia, the defendant, JOSUE CANO-MORALES, did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a Court of the United States, to wit: Hobbs Act Robbery, as charged in Count Three of this Indictment, which is re-alleged as if fully set forth and incorporated by reference herein.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

FORFEITURE ALLEGATION

Pursuant to Rule 32.2(a) Fed. R. Crim. P., the defendant is hereby notified that if convicted of Counts One and Three of the Indictment, the defendant shall forfeit to the United States, any property, real or personal, which constitutes or is derived from proceeds of the offense charged in that count.

The defendant is further notified that upon conviction of any of the offenses alleged in this Indictment, he shall forfeit any firearm or ammunition involved in or used in any knowing violation of the offense, or any violation of any other criminal law of the United States.

Property subject to forfeiture includes, but is not limited to:

an SR1911 pistol, .45 caliber, serial number 67327842;

and any and all accompanying ammunition.

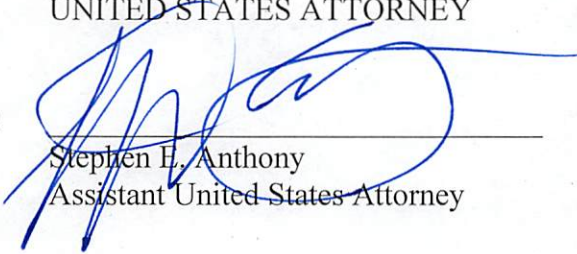
(In accordance with Title 18, United States Code, Section 924(d); Title 18, United States Code, Section 981(a)(1)(C); and Title 28, United States Code, Section 2461(c).)

A TRUE BILL

FOREPERSON

JESSICA D. ABER
UNITED STATES ATTORNEY

By:



Stephen E. Anthony
Assistant United States Attorney

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office